

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FILE STORAGE PARTNERS, LLC, *et al.*,¹

Debtors.

Chapter 11 (Subchapter V)

Case No. 23-10877 (CTG)

(Jointly Administered)

**VERIFIED STATEMENT OF MORRIS JAMES LLP
PURSUANT TO FED. R. BANKR. P. 2019(a)**

Morris James LLP hereby submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure in connection with its representation of certain ad hoc group of noteholders (the “Ad Hoc Noteholder Group”) in these chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors-in-possession (the “Debtors”).

1. As of the date hereof, Morris James represents the following noteholders of File Storage Ops I, LLC in these Chapter 11 Cases:

Claimant Name and Address	Amount of Claim
Alpha Sigma Capital Fund, LP	\$100,000
DBS Ventures LLC (nee Current Connect Ventures LLC)	\$100,000
Electric SB Limited	\$200,000
Patrick Martin	\$200,000
Secure Digital Payments	\$50,000
Michael Terpin	7 BTC (\$250,000 approx.)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: File Storage Partners, LLC (6920); Afton Blockchain LLC (3951); Filtech SPV LLC (9602); and Midwest Blockchain Inc. (8842). The Debtors’ service address is 1357 Ashford Ave., Pmb 373, San Juan, PR 00907.

2. Morris James has fully advised the Ad Hoc Noteholder Group with respect to these concurrent representations. The Noteholders each have (a) consented to such representation and (b) requested that Morris James represent them in these Chapter 11 Cases.

3. The filing of the *Verified Statement of Morris James LLP Pursuant to Fed. R. Bankr. P. 2019(a)* is not intended to waive any rights, actions, defenses, reclamations, setoffs, or recoupments to which the Ad Hoc Noteholder Group are or may be entitled under any agreements, in law or in equity, all of which rights, claims, actions, defenses, reclamations, setoffs, and recoupments the Noteholders expressly reserve.

Dated: July 28, 2023

By: /s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)

Tara C. Pakrouh (DE Bar No. 6192)

MORRIS JAMES LLP

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: emonzo@morrisjames.com

E-mail: tpakrouh@morrisjames.com

Counsel for the Ad Hoc Noteholder Group

Sworn to and subscribed before me this 28th day of July, 2023.

Ellen M. Carey

Notary Public

My Commission Expires: 11/14/2023

